

## Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act, or RCRA, ensures the safe treatment, storage and disposal of hazardous waste generated nationwide. All of the Army's chemical agent disposal facilities (CDFs) are subject to RCRA and must obtain a permit before construction of disposal facilities can begin.

RCRA, implemented by the U.S. Environmental Protection Agency (EPA), regulates the management of hazardous waste from the moment it is generated until final disposition. Several aspects of RCRA affect the chemical stockpile disposal program, specifically the standards for generators and treatment, storage, and disposal facilities.

### Generators

Generators of hazardous waste must comply with standards for storage, waste tracking, labeling, recordkeeping and reporting. CDFs generate hazardous waste as a residual of operations. These wastes include spent charcoal, ash and used personal protective equipment.

### Treatment, Storage, and Disposal Facilities (TSDFs)

Facilities that wish to treat, store or dispose of hazardous waste must first obtain a RCRA permit. RCRA requires these facilities to manage hazardous waste in a manner that is fully protective of human health and the environment. Among other requirements, each facility must have emergency plans and must ensure that plant personnel are properly trained to handle hazardous waste. Since the CDFs do treat and store hazardous waste, RCRA permits are required.

### Permitting Process

CDFs must obtain a RCRA permit to manage hazardous wastes. The process of obtaining a permit is long and complex, with oversight from both federal EPA and the state environmental agency. Public participation is also required throughout the process.

### What is a hazardous waste?

A hazardous waste is any solid waste that is either listed or characteristic.

Listed hazardous wastes are specifically identified in the regulations. An example of a listed waste is trichlorethylene (TCE) used in dry-cleaning.

Characteristic hazardous wastes exhibit any one of four hazardous waste characteristics:

- Ignitability
- Corrosivity
- Reactivity
- Toxicity

To receive a RCRA permit, the Army must submit a detailed permit application describing how the CDF will be built and operated to comply with RCRA regulations. Prior to submitting the permit application, the Army must hold a pre-application meeting to inform the public of its intent to submit an application and to obtain comments. The state and EPA then review the application, generally request additional information and/or clarification, develop draft permit conditions, and issue a draft permit for public comment. During this comment period, there are public meetings and a public hearing. After comments are received and incorporated, a final RCRA permit is issued. Construction and operation of the CDF may not begin until the Army is issued a permit. Every 10 years thereafter, the permit must be renewed.

For more information,  
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